

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

TRIDENT ENTERPRISES, LTD., et al.)
)
Plaintiff/ Counter-)
Defendants,)
v.) **Civil Action No. 1:09-cv-1355**
)
AIRTRONIC USA, INC.)
)
Defendant/ Counter-)
Plaintiff.)

DEFENDANT AIRTRONIC'S PROPOSED JURY INSTRUCTIONS

Defendant/Counter-Plaintiff, Airtronic USA, Inc. ("Airtronic"), by its attorneys, pursuant to Local Rule 51 hereby proposes the attached jury instructions. Airtronic respectfully requests that the attached proposed instructions be given to the jury by the Court. Each of the instructions is to be considered a separate request, and a separate ruling is requested for each instruction.

Airtronic respectfully reserves the opportunity to submit such other requested instructions as may be appropriate in light of any in limine rulings as well as the proof and ruling at trial. Further, by submitting these proposed instructions, Airtronic does not waive its Motion for Summary Judgment. Finally, Airtronic reserves the right to object that certain of the instructions tendered by the parties should not be given, or that they should be given only as modified in accord with the Court's rulings on any outstanding motions and/or the facts proven at trial.

Dated: September 3, 2010

Respectfully Submitted,

/s/ Gabriel D. Soll
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CERTIFICATE OF SERVICE

I hereby certify that I caused to be served, a true and accurate copy of the foregoing Defendant Airtronic's Proposed Jury Instructions, via the Court's CM/ECF system to the Clerk, which will also notify the following persons that such filing has been made:

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